

Hellerstein, J

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

----- X  
JOHN T. METCALF, and LAWRENCE  
DOPPELT and MANNY DOPPELT, as Co-  
Trustees of the Frederick Doppelt Trust,  
derivatively on behalf of Eagle Bulk Shipping  
Inc.,

Plaintiffs,

v.

SOPHOCLES N. ZOULLAS, ALEXIS P.  
ZOULLAS, DOUGLAS P. HAENSEL, JON  
TOMASSON, JOSEPH M. CIANCIOLO,  
DAVID B. HILEY, THOMAS B. WINMILL,  
FORREST E. WYLIE, ALAN S. GINSBERG,

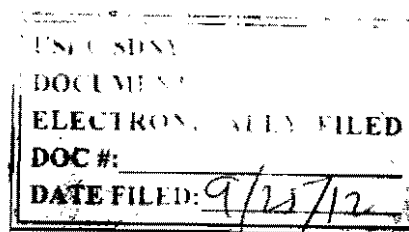
Defendants,

and  
EAGLE BULK SHIPPING INC.,

Nominal Defendant :  
----- X

ECF CASE

11-cv-03996-AKH



**STIPULATION OF WITHDRAWAL OF COUNSEL**

WHEREAS, the law firms of Wilmer Cutler Pickering Hale and Dorr LLP, 7 World Trade Center, 250 Greenwich Street, New York, NY 10007 ("WilmerHale") and Seward & Kissel LLP, One Battery Park Plaza, New York, NY 10004 ("Seward") are currently co-counsel of record for defendants Sophocles N. Zoullas, Alexis P. Zoullas, Alan S. Ginsberg, Douglas P. Haensel, Jon Tomasson, Joseph M. Cianciolo, David B. Hiley, Thomas B. Winmill, and Forrest E. Wylie, and nominal defendant Eagle Bulk Shipping Inc. in the above-captioned action;

IT IS HEREBY STIPULATED AND AGREED, by and among the parties hereto, through their undersigned counsel, that WilmerHale hereby withdraws as counsel of record for

defendants Sophocles N. Zoullas, Alexis P. Zoullas, Alan S. Ginsberg, and nominal defendant Eagle Bulk Shipping Inc. ("insider defendants"). Seward will continue to represent the aforementioned insider defendants in this action.

IT IS FURTHER STIPULATED AND AGREED that Seward hereby withdraws as counsel of record for defendants Douglas P. Haensel, Jon Tomasson, Joseph M. Cianciolo, David B. Hiley, Thomas B. Winmill, and Forrest E. Wylie ("outsider defendants"). WilmerHale will continue to represent the aforementioned outsider defendants in this action.

DONE and ORDERED  
this \_\_\_\_\_ day of \_\_\_\_\_, 2012.

HON. ALVIN K. HELLERSTEIN  
United States District Judge

Agreed to by:



WILMER CUTLER PICKERING  
HALE AND DORR LLP

SEWARD & KISSEL LLP



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*Attorneys for Defendants Sophocles N. Zoullas,  
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Bulk Shipping Inc.*

*Attorneys for Defendants Douglas P. Haensel,*

defendants Sophocles N. Zoullas, Alexis P. Zoullas, Alan S. Ginsberg, and nominal defendant Eagle Bulk Shipping Inc. ("insider defendants"). Seward will continue to represent the aforementioned insider defendants in this action.

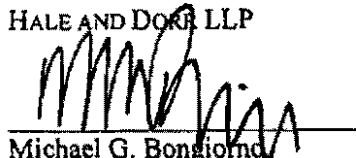
IT IS FURTHER STIPULATED AND AGREED that Seward hereby withdraws as counsel of record for defendants Douglas P. Haensel, Jon Tomasson, Joseph M. Cianciolo, David B. Hiley, Thomas B. Winmill, and Forrest E. Wylie ("outsider defendants"). WilmerHale will continue to represent the aforementioned outsider defendants in this action.

DONE and ORDERED  
this 24 day of Sept, 2012.

  
HON. ALVIN K. HELLERSTEIN  
United States District Judge


Agreed to by:

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HALE AND DORR LLP

  
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Hiley, Thomas B. Winmill, and Forrest E.  
Wylie*